Louisville Metro Air Pollution Control District
850 Barret Avenue
Louisville, Kentucky 40204-1745

Title V Operating Permit

Permit No.: 135-97-TV (R2) Plant ID: 0026

Effective Date: 5/16/2012 Expiration Date: 5/31/2017

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Brown-Forman Cooperages Company, Inc.
402 MacLean Ave
Louisville, KY 40209

The applicable procedures of District Regulation 2.16 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Application No. 10450
27645

Application Received: 7/21/2005
4/20/2009

Permit Writer: Shannon Hosey

Air Pollution Control Officer
April 27, 2012

Date of Public Notice: 2/26/2012

Date of Proposed Permit: 2/26/2012

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Title V Permit Revisions/Changes

Revision No.	Issue Date	Public Notice Date	Type	Attachment No./ Page No.	Description
N/A	01/22/2001	10/22/2000	Initial	Entire Permit	Initial Permit Issuance
R1	04/16/2012	02/26/2012	Renewal	Entire Permit	5 year renewal and incorporating construction permits # 180-04-C, 181-04-C, 335-05-C, 363-07-C, 363-07-C (R1), 364-07-C (R1), 573-08-C, 118-09-C, 202-09-C, 123-10-C and 32864-11-C
R2	04/27/12	02/26/12	Admin Change	Cover Page	Correct Dates

Abbreviations and Acronyms

AFS - AIRS Facility Subsystem
AIRS - Aerometric Information Retrieval System
ASL - Adjusted Significant Level
atm - Atmosphere
BACT - Best Available Control Technology
Btu - British thermal unit
CEMS - Continuous Emission Monitoring System
CAAA - Clean Air Act Amendments (15 November 1990)
HAP - Hazardous Air Pollutant
hr - Hour
lbs - Pounds
l - Liter
LMAPCD - Louisville Metro Air Pollution Control District
MACT - Maximum Achievable Control Technology
m - Meter
mg - Milligram
mm - Millimeter
MM - Million
MOCS - Management of Change System
NAICS - North American Industry Classification System
NSR - New Source Review
NOx - Nitrogen oxides
NSPS - New Source Performance Standards
PM - Particulate Matter
PM_{10} - Particulate Matter less than 10 microns
ppm - Parts per million
PSD - Prevention of Significant Deterioration
PMP - Preventive Maintenance Plan
psia - Pounds per square inch absolute
RACT - Reasonably Available Control Technology
SIC - Standard Industrial Classification
SIP - State Implementation Plan
SO_2 - Sulfur dioxide
TAC - Toxic Air Contaminant
TAL - Threshold Ambient Limit
TAP - Toxic Air Pollutant
tpy - Tons per year
UTM - Universal Transverse Mercator
VOC - Volatile Organic Compound

Preamble

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Louisville Metro Air Pollution Control District (LMAPCD) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit General Conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of LMAPCD. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The General Conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The owner or operator's Title V permit may include a current table of "insignificant activities."

Insignificant activities are defined in District Regulation 2.16 section 1.23, as of the date the permit was proposed for review by U.S. EPA, Region 4.

Insignificant activities identified in District Regulation 2.02, section 2 may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16 section 3.5.4.1.4.

Insignificant activities identified in District Regulation 2.02, section 2 shall comply with generally applicable requirements as required by Regulation 2.16 section 4.1.9.4.

General Conditions

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)

2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:

   US EPA - Region IV
   Air Enforcement Branch
   Atlanta Federal Center
   61 Forsyth Street
   Atlanta, GA 30303-8960

3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:

   a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.

   b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.

4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.

5. **Emergency Provision**

a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

i. An emergency occurred and that the owner or operator can identify the cause of the emergency.

ii. The permitted facility was at the time being properly operated.

iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

c. This condition is in addition to any emergency or upset provision contained in an applicable requirement. (Regulation 2.16, sections 4.7.1 through 4.7.4)

6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08, section 1.3. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.6)

7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.

8. **Enforceability Requirements** - Except for the conditions that are specifically designated as “District Only Enforceable Conditions”, all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)

9. **Enforcement Action Defense**

a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the

permitted activity in order to maintain compliance with the conditions of this permit.

b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation. (Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)

10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.

11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6)

If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)

12. **Insignificant Activities** - The owner or operator shall:

a. Notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)

b. Submit a current list of insignificant activities by April 15 of each year with the annual compliance certification, including an identification of the additions and removals of insignificant activities that occurred during the preceding year. (Regulation 2.16, section 4.3.5.3.6)

13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:

a. Enter the premises to inspect any emissions-related activity or records required in this permit.

b. Have access to and copy records required by this permit.

c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.

d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements. (Regulation 2.16, section 4.3.2)

14. **Monitoring and Related Record Keeping and Reporting Requirement** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner or operator shall submit all required monitoring reports at least once every six months,

unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. All semi-annual compliance reports shall include the following certification statement per Regulation 2.16.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete".
- Signature and title of company responsible official.

If a change in the "Responsible Official" (RO) occurs during the term of this permit, the owner or operator shall provide written notification (Form AP 100-A) to the District within 30 calendar days following the date a change in the designated RO occurs for this facility.

The semi-annual compliance reports are due on or before the following dates of each calendar year:

Reporting Period	Report Due Date
January 1 through June 30	August 29th
July 1 through December 31	March 1st[1]

[1]Note: The date for leap years is February 29th.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, section 5. (Regulation 2.16, section 4.1.5)

16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.

17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 5.4.

18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.

19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.

20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.

21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)

22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.

23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and Permit renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.

24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1 through 5.11.6. For purposes of section 5.11.1, substantial or unresolved noncompliance includes, but is not limited to:

    a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.

    b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.

    c. Knowingly making any false statement in any permit application.

    d. Noncompliance with Regulation 1.07, section 4.2; or

    e. Noncompliance with KRS Chapter 77.

25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.

26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.

27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.

28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, section 1; and 2.16, sections 5.1.1.2 and 5.5.4.

29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.

30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.

31. **Risk Management Plan (112(r))** - For each process subject to section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.

32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)

33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.

34. **Startups, Shutdowns, and Upset Conditions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.

35. **Submittal of Reports, Data, Notifications, and Applications**

    a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.3, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.12 shall be submitted to:

    Louisville Metro Air Pollution Control District
    850 Barret Ave
    Louisville, KY 40204-1745

    b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

    US EPA - Region IV
    APTMD - 12th floor
    Atlanta Federal Center
    61 Forsyth Street
    Atlanta, GA 30303-3104

36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following:

Regulation	Title
1.01	General Provisions
1.02	Definitions
1.03	Abbreviations And Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards And Maintenance Requirements

Regulation	Title
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Shutdowns, Malfunctions, Startups, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application
2.02	Air Pollution Regulation Requirements and Minor Facility Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Other Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

District Only Enforceable:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
5.01	Standards for Toxic Air Contaminants and Hazardous air Pollutants
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants

37. **Stratospheric Ozone Protection Requirements** - Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts A, B, and F. Those requirements include the following restrictions:

a. Any facility having any refrigeration equipment normally containing fifty (50) pounds of refrigerant, or more, must keep servicing records documenting the date and type of all service and the quantity of any refrigerant added according to 40 CFR 82.166;

b. No person repairing or servicing a motor vehicle may perform any service on a motor vehicle air conditioner (MVAC) involving the refrigerant for such air conditioner unless the person has been properly trained and certified as provided in 40 CFR 82.34 and 40 CFR 82.40, and properly uses equipment approved according to 40 CFR 82.36 and 40 CFR 82.38, and complies with 40 CFR 82.42;

c. No person may sell or distribute, or offer for sale or distribution, any substance listed as a Class I or II substance in 40 CFR 82, Subpart A, Appendices A and B, except in compliance with 40 CFR 82.34(b), 40 CFR 82.42, and/or 40 CFR 82.166;

d. No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release into the atmosphere any Class I or II substance used as a refrigerant in such equipment and no other person may open appliances (except MVACs as defined in 40 CFR 82.152) for service, maintenance, or repair unless the person has been properly trained and certified according to 40 CFR 82.161 and unless the person uses equipment certified for that type of appliance according to 40 CFR 82.158 and unless the person observes the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;

e. No person may dispose of appliances (except small appliances, as defined in 40 CFR 82.152) without using equipment certified for that type of appliance according to 40 CFR 82.158 and without observing the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;

f. No person may recover refrigerant from small appliances, MVACs and MVAC-like appliances (as defined in 40 CFR 82.152), except in compliance with the requirements of 40 CFR 82 Subpart F;

g. If the permittee manufactures, transforms, imports, or exports, a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), the permittee is subject to all requirements as specified in 40 CFR 82 Subpart A, Production and Consumption Controls. (Regulation 2.16, section 4.1.5)

Emission Unit U2: Barrel and Head Production and Finishing Operations

U2 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
2.05	Prevention of Significant Deterioration of Air Quality	1 and 2
6.09	Standards of Performance for Existing Process Operations	1, 2, 3 and 5
7.08	Standards of Performance for New Process Operations	1, 2, 3.1, 3.2 and 3.3

U2 Equipment			
Emission Point	**Description**	**Applicable Regulation**	**Control ID**
E1	Conveyance from Woodworking 1 equipment consisting of Rounder saw #1 & #2, Rounder and Scrap Grinder, Finish Head planer, Heading rip saw, Narrow Head planers, Narrow Heading Edger, Rough Head planers, Stave Ripsaw #3 and Narrow Heading Jointer (2-4) to new process cyclone (Construction permit 32864-11-C)	7.08	C1
E2	Conveyance from Woodworking 2 equipment consisting of Heading Jointers (1-1, 1-2, 1-3, 2-2, 2-3), Stave Jointers (1-1 through 1-5 & 2-1 through 2-5), Equalizer #2, Planer #2 and Stave ripsaw #2 and Slicer Wheel to process cyclone	7.08	C2
E3	Conveyance from Woodworking 3 equipment consisting of Heading Jointers 2-1, Stave Jointers 3-1 through 3-5, Equalizer #1 & #3, and Planer #1 & #3 to process cyclone	7.08	C3
E4	Conveyance from Woodworking 4 equipment consisting of Stave Equalizers 1-3 and Heading process cyclone and Truck off loading to process cyclone	7.08	C4
E5	Conveyance from Woodworking 5 equipment consisting of Scrap Hog and Block Hog to process cyclone	7.08	C5
E6	Sawdust Storage Tank, installed in 1969	6.09	N/A

U2 Control Devices				
Control ID	**Description**	**Performance Indicator**	**Range**	**Stack ID**
C1	One (1) Donaldson Torit pulse-jet baghouse, model number 276RFW10 to control E1	Pressure Drop	1-6" H_2O	S1
C2	One (1) baghouse to control E2			S2
C3	One (1) Donaldson Torit pulse-jet baghouse, model number 276RFW10 to control E3			S3
C4	One (1) baghouse to control E4			S4
C5	One (1) baghouse to control E5			S5

U2 Specific Conditions

S1. **Standards (Regulation 2.16, section 4.1.1)**

a. **PM**

i. The owner or operator shall not allow PM emissions to exceed 4.34 lb/hr for the process cyclone (E4). (Regulation 7.08, section 3.1.2) (See Comment 1)

ii. The owner or operator shall not allow PM emissions to exceed 2.51 lb/hr for the process cyclone (E2). (Regulation 7.08, section 3.1.2) (See Comment 1)

iii. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr for the process cyclone (E5). (Regulation 7.08, section 3.1.2) (See Comment 1)

iv. The owner or operator shall not allow PM emissions to exceed 15.62 lb/hr for the process cyclone (E3). (Regulation 7.08, section 3.1.2) (See Comment 3)

v. The owner or operator shall not allow PM emissions to exceed 6.68 lb/hr for the process cyclone (E1). (Regulation 7.08, section 3.1.2) (See Comment 4)

vi. The owner or operator shall not allow the production of all on-spec and off-spec staves to exceed 22,785,000 per 12 consecutive month period and the production of all on-spec and off-spec heads shall not exceed 1,470,000 per 12 consecutive month period. (Regulation 2.05)

vii. The owner or operator shall not allow the PM emissions to equal or exceed 25 tons per 12 consecutive month period for process cyclones (E4), (E2), and (E5). (Regulation 2.05) (See Comment 2)

viii. The owner or operator shall operate and maintain the control devices at all times that the process equipment (E4), (E2), and (E5) are in operation.

b. **Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1 and Regulation 6.09, section 3.1.)

S2. **Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**
The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. **PM**

i. The owner or operator shall monitor and record the pressure drop across the baghouses (C4, C2, and C5) once each operating day to ensure the pressure drop is between 1 and 6 inches water column.

ii. The owner or operator shall, monthly, perform a visual inspection of the structural and mechanical integrity of the baghouses for signs of damage, air leakage, corrosion, etc. and repair as needed.

iii. The owner or operator shall maintain daily records of any periods of time where the process was operating and the control devices were not operating or a declaration that the control devices operated at all times that day when the process was operating.

iv. The owner or operator shall record the amount of spec and off-spec staves and heads produced monthly.

v. The owner or operator shall clearly record and identify all periods of exceedance of the pound per hour PM emission standards, during by passes, including the emission point designation, quantity of the exceedance, duration of exceedance, reason for exceedance, and any corrective action taken.

b. **Opacity**

i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation and daylight hours, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.

ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.

iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

S3. **Reporting (Regulation 2.16, section 4.1.9.3)**

a. **PM**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for:

i. The number of staves and heads produced each month and the 12 consecutive month production for each month.

ii. Identification of all periods of exceedance of the pound per hour PM emission standard, including the emission point designation, quantity of the exceedance, duration of the exceedance, reason for exceedance, and any corrective action taken or a negative declaration.

iii. Identification of all periods of control devices bypassing or downtime; or a negative declaration;

iv. Identification of the operating parameter being monitored and the number, duration, and cause of all excursions (Excursions are defined as any departure from the performance indicator range); and

v. Description of any corrective action taken for each excursion.

b. **Opacity**

i. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;

ii. The date, time and results of each Method 9 conducted. If there were no Method 9 tests performed during the reporting period, the owner or operator may submit a negative declaration; and

iii. Description of any corrective action taken.

U2 Comments

1. The potential controlled PM emission rates are 3.83 lb/hr for process cyclone (E4), 1.58 lb/hr for process cyclone (E2), and 0.65 lb/hr for process cyclone (E5). These values are all below the standards, therefore there are no monitoring, record keeping, or reporting requirements except for the control devices.

2. The potential controlled PM/PM_{10} emissions are greater than the significant levels of 25 tpy/15 tpy. The source has taken the production limits in order to avoid PSD.

3. The uncontrolled potential PM emissions for the process cyclone E3 are less than the standard from Regulation 7.08. Therefore, there are no monitoring, record keeping, or reporting requirements to demonstrate compliance with this standard.

4. A one-time PM Demo has shown that the regulatory emission limit for E1 cannot be exceeded when controls are operating.

5. Emission Unit 2 incorporates construction permits 180-04-C, 181-04-C, 363-07-C(R1), 364-07-C(R1) and 32864-11-C.

Emission Unit U3: Barrel and Head Charring Operations

U3 Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
6.09	Standards of Performance for Existing Process Operations	1, 2, 3 and 5
6.42	Reasonably Available Control Technology Requirements for Nitrogen Oxides-Emitting Facilities	1 through 5

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
5.01	General Provisions	1 through 4
5.02	Adoption of National Emission Standards for Hazardous Air Pollutants	3.1, 3.16
5.14	Hazardous Air Pollutants and Source Categories	1 and 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

U3 Equipment			
Emission Point	**Description**	**Applicable Regulation**	**Control ID**
E8	Barrel Charring Operation, installed in 1958	6.09	C6
		6.42	
E9	Head Charring Operation, installed in 1955	6.09	N/A
		6.42	

U3 Control Devices				
ID	**Description**	**Performance Indicator**	**Range**	**Stack ID**
C6	Venturi Wet Scrubber	N/A	N/A	S-7
	Wet Electrostatic Precipitator	N/A	N/A	

U3 Specific Conditions

S1. **Standards (Regulation 2.16, section 4.1.1)**

a. **PM**

i. The owner or operator shall not allow PM emissions to exceed 3.13 lb/hr for the Barrel Charring Operations. (Regulation 6.09, section 3.2) (See Comment 1)

ii. The owner or operator shall not allow PM emissions to exceed 2.58 lb/hr for the Head Char/Toasting Operations. (Regulation 6.09, section 3.2) (See Comment 1)

b. **Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity (Regulations 6.09, section 3.1)

c. **NOx**

i. The owner or operator shall not allow NOx emissions to exceed 300 ppm by volume expresses as NO_2. (Regulation 6.09, section 4.1.) (See Comment 3)

ii. The owner or operator shall not equal or exceed, plant-wide, 100 tons per 12 consecutive month period of NOx and 8.33 tons per month on a month basis. (Regulation 6.42) (See Comment 2)

d. **TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.01 and 5.21)

S2. **Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. **PM**

i. The owner or operator shall, monthly, perform a visual inspection of the structural and mechanical integrity of the control devices for signs of damage, air leakage, corrosion, etc. and repair as needed.

ii. The owner or operator shall keep records, monthly, of the visual inspection of the structural and mechanical integrity of the control devices.

b. **Opacity**

i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation and daylight hours, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.

ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.

iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

c. **NOx**

The owner or operator shall monthly calculate and record the calendar month and consecutive 12-month total plant-wide NOx emissions.

d. **TAC**

i. The owner or operator shall record the amount of spec and off-spec staves and heads produced monthly.

ii. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.

iii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

S3. **Reporting (Regulation 2.16, section 4.1.9.3)**

a. **PM**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for PM:

1) Any deviation from the requirement to perform the required monthly visual inspections of the control devices; and

2) Any deviation from the requirement to record the results of each monthly visual control device inspection.

b. **Opacity**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for Opacity:

i. Emission Unit ID number and Stack ID number;

ii. The beginning and ending date of the reporting period;

iii. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;

iv. The date, time and results of each Method 9 conducted. If no Method 9 tests were conducted during the reporting period, the owner or operator may submit a negative declaration; and

v. Description of any corrective action taken.

c. **NOx**

The calendar month and consecutive 12-month total plant-wide NOx emissions for each month in the reporting period

d. **TAC**

Within 6 months of a change of a raw material as described in iv, the owner or operator shall submit the re-evaluated EA demonstration to the District.

U3 Comments

1. The potential uncontrolled PM emission rate is less than the standard in Regulation 7.08.

2. The District has determined that the source has the potential to exceed 100 tons per year of NOx; therefore, has included a plant-wide limit to avoid NOx RACT.

3. The potential uncontrolled NOx emission rate was calculated to be 4.17 ppm, which is less than the standard. Therefore, there is no monitoring, record keeping or reporting requirements for this standard

4. Emission Unit 3 incorporates construction permit 335-05-C and 123-10-C.

5. Based on Tier 3 modeling (SCREEN3), the carcinogenic risk for each TAC is below 1.0 for non-industrial property and below 10.0 for industrial property by limiting the amount of production of the barrel and head char operations. The carcinogenic risk for all TACs for all processes is below 7.5 for non-industrial property and below 75.0 for industrial property. The following table represents the Risk or R_c based on the maximum off-site concentration predicted from the Tier 3 modeling (SCREEN3) runs. Since the maximum off-site Risk meets the more stringent non-industrial R_c of less than 7.5 for the plant-wide cumulative risk, the source has demonstrate compliance with the EA Goals for each TAC.

Process	TAC	Risk from all processes on industrial and non-industrial property
Barrel Char	Arsenic	0.0046
	Benzene	0.0009
	Chromium VI	0.0028
	Formaldehyde	0.0091
	Manganese	0.20
Boiler	Arsenic	1.01
	Formaldehyde	0.60
	Benzene	0.34
	Chromium VI	0.45
	Cadmium	0.08
	Nickel	0.09
Glue Operation	Formaldehyde	1.10
Total		3.91

Emission Unit U4: Glue Application and Operations

U4 Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
6.24	Standards of Performance for Existing VOC	1 through 6

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
5.01	Standards for Toxic Air Contaminants and Hazardous Air Pollutants	1 through 4
5.02	Adoption of National Emission Standards for Hazardous Air Pollutants	3.1, 3.16
5.14	Hazardous Air Pollutants and Source Categories	1 and 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

U4 Equipment			
Emission Point	**Description**	**Applicable Regulation(s)**	**Control ID**
E10	Wood Glue Operations (Clamp Carrier), installed in 1980	6.24	N/A
E11	Glue Applicator, installed in 1980		

U4 Control Devices: There are no control devices associated with Emission Unit U4.

U4 Specific Conditions

S1. **Standards (Regulation 2.16, section 4.1.1)**

a. **VOC**

Class III Solvents - No owner or operator subject to this regulation shall discharge into the atmosphere more than 3,000 pounds of organic materials in any one day, nor more than 450 pounds in any one hour, from any existing affected facility in which any Class III solvent or any material containing such solvent is employed or applied unless the discharge has been reduced by at least 85% by weight. (Regulation 6.24, section 3.3)

b. **TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.01 and 5.21)

S2. **Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. **VOC**

The owner or operator shall maintain records, monthly, of the following:

i. The quantity of glue used or applied;

ii. The type and the amount of each VOC containing material based on the weight % of each VOC;

iii. The number of operating hours for each operating day; and

iv. The hourly and daily VOC emissions for Class III solvents subject to Regulation 6.24.

b. **TAC**

i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.

ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

S3. **Reporting (Regulation 2.16, section 4.1.9.3)**

a. **VOC**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for Regulation 6.24:

i. Emission Unit ID number and Emission Point and /or Stack ID number;

ii. Identification of all periods of exceedances of the hourly and daily VOC emission limit including the quantity of excess emissions;

iii. Reason for excess emissions whether process upset, control device malfunction, other know causes; or unknown causes;

iv. Description of any corrective action taken; and

v. A negative declaration if no excess emissions occurred.

b. **TAC**

Within 6 months of a change of a raw material as described in S2.b.ii, the owner or operator shall submit the re-evaluated EA demonstration to the District.

U4 Comments

1. Based on Tier 3 modeling (SCREEN3), the carcinogenic risk for each TAC is below 1.0 for non-industrial property and below 10.0 for industrial property by limiting the amount of production. The carcinogenic risk for all TACs for all processes is below 7.5 for non-industrial property and below 75.0 for industrial property. The following table represents the Risk or R_c based on the maximum off-site concentration predicted from the Tier 3 modeling (SCREEN3) runs. Since the maximum off-site Risk meets the more stringent non-industrial R_c of less than 7.5 for the plant-wide cumulative risk, the source has demonstrate compliance with the EA Goals for each TAC.

Process	TAC	Risk from all processes on industrial and non-industrial property
Barrel Char	Arsenic	0.0046
	Benzene	0.0009
	Chromium VI	0.0028
	Formaldehyde	0.0091
	Manganese	0.20
Wood-Fired Boiler	Arsenic	1.01
	Formaldehyde	0.60
	Benzene	0.34
	Chromium VI	0.45
	Cadmium	0.08
	Nickel	0.09
Glue Operation	Formaldehyde	1.10
Total		3.91

Emission Unit U5: Power/Steam Generation System

U5 Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
6.07	Standard of Performance for Existing Indirect Heat Exchangers	1 through 4
6.09	Standards of Performance for Existing Process Operations	1,2,3 and 5
6.42	Reasonably Available Control Technology Requirements for Nitrogen Oxides-Emitting Facilities	1 through 5
7.02	Adoption of Federal New Source Performance Standards	1 through 5
7.06	Standards of Performance of New Indirect Heat Exchangers	1 through 7
7.08	Standards of Performance for New Process Operations	1,2,3 and 5
40 CFR 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	60.40c, 60.41c, and 60.48c(a)
40 CFR 63 Subpart JJJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources	63.11201(b), 63.11205(a) 63.11214(c), 63.11225(b) and 63.11225(6)(c)

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
5.01	Standards for Toxic Air Contaminants and Hazardous Air Pollutants	1 through 4
5.02	Adoption of National Emission Standards for Hazardous Air Pollutants	3.1, 3.16
5.14	Hazardous Air Pollutants and Source Categories	1 and 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

U5 Equipment			
Emission Point	**Description**	**Applicable Regulation**	**Control ID**
E12	One (1) Wood-Fired Boiler rated at 42 MMBtu/hr, installed in 1967	6.07 6.42 40 CFR 63 Subpart JJJJJJ	C-11
E13	Sawdust Storage Tank, Screw Conveyor, Cyclone	6.09	C-13
E14	One (1) Natural Gas Boiler rated at 27 MMBtu/hr, installed in 1999	6.42 7.06 40 CFR 60 Subpart Dc	N/A
E21	Boiler feed hammermill rated at 6000 lb/hr	7.08	C-13
E22	Screw Conveyor rated at 6000 lb/hr	7.08	N/A
E23	Weigh Conveyor rated at 6000 lb/hr	7.08	N/A

U5 Control Devices				
ID	**Description**	**Performance Indicator**	**Range**	**Stack ID**
C-11	One (1) Wet Scrubber	Pressure Drop	2"- 6" H_2O	S-12
C-13	One (1) pulse-jet baghouse, installed 2007		1"- 6" H_2O	S-6

U5 Specific Conditions

S1. **Standards (Regulation 2.16, section 4.1.1)**

a. **PM**

i. For the wood-fired boiler (E12), the owner or operator shall not cause to be discharged into the atmosphere from that affected facility particulate matter in excess of 0.40 pounds per million BTU actual total heat input. (Regulation 6.07, section 3.1)

ii. For the natural gas boiler (E14), the owner or operator shall not cause to be discharged into the atmosphere from that affected facility particulate matter in excess of 0.33 pounds per million BTU actual total heat input. (Regulation 7.06, section 4.1.4) (See Comment 1)

iii. For sawdust handling (E13), the owner or operator shall not allow PM emissions to exceed 5.7 lb/hr for each piece of equipment. (Regulation 6.09, section 3.2) (See Comment 3)

iv. For emission points (E20, E21, E22, and E23) the owner or operator shall not allow PM emissions to exceed 7.09 lb/hr for each emission point. (Regulation 7.08, section 3.1.2) (See Comment 3)

b. **Opacity**

i. The owner or operator shall not cause the emission into the open air of particulate from any indirect heat exchanger which is greater than 20% opacity. (Regulation 6.07, section 3.2 and Regulation 7.06, section 5.1.1)

ii. The owner or operator shall not allow visible emissions to equal or exceed 20% opacity (Regulations 6.09, section 3.1 and Regulation 7.08, section 3.1.1)

iii. The owner or operator shall utilize the wet scrubber (C11) at all times the wood-fired boiler (E12) is in operation shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

c. **SO_2**

i. For the wood-fired boiler (E12), the owner or operator shall not cause to be discharged into the atmosphere from that affected facility any gases which contain sulfur dioxide in excess of 2.34 pounds per million BTU actual total heat input for combustion of liquid and gaseous fuels. (Regulation 6.07, section 4.1)

ii. For the natural gas boiler (E14), the owner or operator shall not cause to be discharged into the atmosphere from that affected facility any gases which contain sulfur dioxide in excess of 1.0 pounds per million BTU actual total heat input for combustion of liquid and gaseous fuels. (Regulation 7.06, section 5.1.1) (See Comment 1)

d. **NOx**

The owner or operator shall not equal or exceed, plant-wide, 100 tons per 12 consecutive month period of NOx and 8.33 tons per month on a month basis. (Regulation 6.42) (See Comment 2)

e. **TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.01 and 5.21)

f. **HAP**

i. Unless altered by Federal decisions reached subsequent to the issue date of this permit, the standards of this section will become effective on 21 March 2014 for the wood-fired boiler (E12).

ii. At all times the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.
(40 CFR 63.11205(a))

iii. The owner or operator must have a one-time energy assessment performed by a qualified energy assessor. This assessment must meet the requirements outlined in 40 CFR 63, subpart JJJJJJ, Table 2, item 4.
(40 CFR 63.11201(b))

1) Visual inspection;
2) An evaluation of operating characteristics of the facility;
3) Inventory of major energy-consuming systems;
4) A review of available architectural and engineering plans;
5) A review of the facility's energy management practices;
6) A list of major energy conservation measures;
7) A list of energy savings; and
8) A comprehensive report detailing the ways to improve efficiency

iv. The owner or operator must must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed and submit, upon request, the energy assessment report (40 CFR 63.11214(c))

S2. **Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of 5 year and make the records readily available to the District upon request.

a. **PM**

i. For the natural gas boiler, the uncontrolled PM emissions are below the emission standards, therefore, no ongoing compliance monitoring or record keeping is required except for recording fuel usage:

1) The quantity of natural gas burned each operating day; and
2) The number of operating hours for each operating day

ii. For the wet scrubber (C11) controlling the wood fired boiler (E12), the owner or operator shall monitor and record the pressure drop across the scrubber at least once per each operating day to ensure the pressure drop is between 2 and 6 inches water column.

iii. For baghouse (C13) controlling the wood fuel storage system (E13) and baghouse (C1) controlling the heading process hammermill (E20); the owner or operator shall monitor and record the pressure drop across the baghouse at least once per each operating day to ensure the pressure drop is between 1 and 6 inches water column.

iv. The owner or operator shall keep records, monthly, of the visual inspection of the structural and mechanical integrity of the dust collectors.

v. If there is any time that the control device is bypassed or not in operation when the process is operating, then the owner or operator shall keep a record of the following for each bypass event:

1) Date;
2) Start time and stop time;
3) Identification of the control device and process equipment;
4) PM emissions during the bypass in lb/hr;
5) Summary of the cause or reason for each bypass event;
6) Corrective action taken to minimize the extent or duration of the bypass event; and
7) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

b. **Opacity**

i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation and daylight hours, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.

ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.

iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

c. **SO_2**

i. For the natural gas boiler, the uncontrolled SO_2 emissions are below the emission standards, therefore, no ongoing compliance monitoring or record keeping is required except for recording monthly fuel usage:

1) The quantity of natural gas burned each operating day; and

2) The number of operating hours for each operating day

ii. The owner or operator shall keep daily records of the amount of wood waste combusted each day.

iii. The owner or operator shall record the weight percent sulfur contained in the sawdust/wood used as a fuel.

d. **NOx**

The owner or operator shall monthly calculate and record the calendar month and consecutive 12-month total plant-wide NOx emissions.

e. **TAC**

i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.

ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

f. **HAP**

i. Unless altered by Federal decisions reached subsequent to the issue date of this permit, the monitoring and recordkeeping requirements of this section will become effective on 21 March 2014 for the wood-fired boiler (E12).

ii. The owner or operator shall maintain the records specified in 40 CFR 63.11225(c)(1), (2), (4) and (5). (40 CFR 63.11225(c))

iii. The owner or operator shall maintain the inspection and monitoring data required by 40 CFR 63.11222 and the information identified in (c)(6)(i) through (vi) for each required inspection or monitoring. (40 CFR 63.11225(c)(6))

S3. **Reporting (Regulation 2.16, section 4.1.9.3)**

a. **PM**

i. For the natural gas boiler, the potential uncontrolled emissions do not exceed the allowable emission limit; therefore no compliance monitoring reports are required. (See Comment 1)

ii. For control devices C-11 and C-13, the owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports

1) Identification of the operating parameter being monitored to demonstrate ongoing compliance;

2) Identification of all periods of control devices bypassing or downtime; or a negative declaration;

3) Identification of the operating parameter being monitored and the number, duration and cause of all excursions (Excursion is defined as any departure from the performance indicator range); and

4) Description of any corrective action taken for each excursion.

b. **Opacity**

i. Identification of all periods of exceedance of the opacity emission standard, including the emission point designation, quantity of the exceedance, duration of the exceedance, reason for exceedance, and any corrective action taken, or a negative declaration;

ii. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;

iii. The date, time and results of each Method 9 conducted. If there were no Method 9 tests performed during the reporting period, the owner or operator may submit a negative declaration.

c. **SO_2**

i. Emission Unit ID number and Emission Point and /or Stack ID number;

ii. The beginning and ending date of the reporting period;

iii. Identification of all periods of exceedances of the SO_2 emission standard including the quantity of excess emissions;

iv. Reason for excess emissions whether process upset, control device, malfunction, other known causes, or unknown causes; and

v. Description of any corrective action taken.

d. **NOx**

i. The calendar month and consecutive 12-month total plant-wide NOx emissions for each month in the reporting period; and

ii. Identification of all periods of exceeding NOx emission limit or standard specified in this permit, including the quantity of excess emissions. If no excess of NOx emissions occur during a reporting period, the owner or operator shall submit a negative declaration.

e. **TAC**

Within 6 months of a change of a raw material as described in S2.b.ii, the owner or operator shall submit the re-evaluated EA demonstration to the District.

f. **HAP**

i. The owner or operator shall submit the notifications specified in 40 CFR 63.11225(a)(1), (2) and (4). (40 CFR 63.11225(a))

ii. The owner or operator shall submit a biennial compliance report, by March 1 biennially, containing the information specified in 40 CFR 63.11225(b)(1) through (3). (40 CFR 63.11225(b))

U5 Comments

1. A one-time PM and SO_2 compliance demonstration has been performed for the natural gas boiler, using AP-42 emission factors and combusting wood residue, and the emission standards cannot be exceeded controlled.

2. The District has determined that the source has the potential to exceed 100 tons per year of NOx; therefore, has included a plant-wide limit to avoid NOx RACT.

3. The potential uncontrolled PM emissions for each piece of equipment are less than the standard from Regulation 7.08.

4. According to ASME Boiler and Pressure Vessel Code, steam boilers require a device which senses steam pressure and cycles the burner or other source of heat in order to maintain a consistent, predetermined operating pressure (120 psia in this case). A second device is used to prevent the boiler from exceeding the maximum allowable working pressure (MAWP) indicated on the boiler nameplate (160 psia in this case). Even though the conveyor can feed more wood waste into the boiler than before, the boiler is the bottleneck, since the steam volume and pressure has not been changed. Therefore, the District has determined that the boiler has not been modified since the amount of steam the boiler can produce has not been increased and the pressures are still the same.

5. The District has determined that that this small natural gas fired boiler would not exceed the 20% opacity standard. Therefore, the company is not required to perform periodic monitoring to demonstrate compliance with the opacity standard.

6. Emission Unit 5 incorporates construction permit 573-07-C.

7. Based on Tier 3 modeling (SCREEN3), the carcinogenic risk for each TAC is below 1.0 for non-industrial property and below 10.0 for industrial property by limiting the amount of production. The carcinogenic risk for all TACs for all processes is below 7.5 for non-industrial property and below 75.0 for industrial property. The following table represents the Risk or R_c based on the maximum off-site concentration predicted from the Tier 3 modeling (SCREEN3) runs. Since the maximum off-site Risk meets the more stringent non-industrial R_c of less than less than 7.5 for the plant-wide cumulative risk, the source has demonstrate compliance with the EA Goals for each TAC.

Process	TAC	Risk from all processes on industrial and non-industrial property
Barrel Char	Arsenic	0.0046
	Benzene	0.0009
	Chromium VI	0.0028
	Formaldehyde	0.0091
	Manganese	0.20
Boiler	Arsenic	1.01
	Formaldehyde	0.60
	Benzene	0.34
	Chromium VI	0.45
	Cadmium	0.08
	Nickel	0.09
Glue Operation	Formaldehyde	1.10
Total		3.91

Emission Unit U6: Barrel Coating and Sealing Operations

U6 Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3.1, 3.2, 4 & 5

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
5.01	General Provisions	1 through 4
5.02	Adoption of National Emission Standards for Hazardous Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1 through 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

U6 Equipment			
Emission Point	**Description**	**Applicable Regulation**	**Stack ID**
E15	Barrel coating and sealing operations, installed in 1993	7.25	N/A

U6 Control Devices: There are no control devices associated with Emission Unit U6.

U6 Specific Conditions

S1. **Standards (Regulation 2.16, section 4.1.1)**

a. **VOC**

The owner or operator shall not allow or cause the *plant-wide* VOC emissions to exceed 5 tons per year for affected facilities subject to Regulation 7.25, unless Best Available Control Technology (BACT) analysis is submitted for review and approval. (Regulation 7.25, sections 2.1 and 3.1)

b. **TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.01 and 5.21)

S2. **Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

a. **VOC**

The owner or operator shall monitor and maintain monthly records each calendar month and consecutive 12-month period of the following information:

1) Quantity of barrel sealant used (in gallons);

2) The weight percent of each VOC in the barrel sealant;

3) The total VOC emissions for each calendar month; and
12 consecutive month VOC emissions for each month.

b. **TAC**

i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.

ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

S3. **Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports:

a. **VOC**

i. Emission Unit ID number and Emission Point and /or Stack ID number;

ii. The beginning and ending date of the reporting period;

iii. Any exceedance of the VOC standard; and

iv. The total monthly and twelve consecutive month VOC emissions.

b. **TAC**

Within 6 months of a change of a raw material as described in U6 S2.b.ii, the owner or operator shall submit the re-evaluated EA demonstration to the District.

Emission Unit U7: Cold Solvent Parts Cleaner (Non-Halogenated)

U7 Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
6.18	Standard of Performance for New Solvent Metal Cleaning Equipment	1, 2, 3, 4.1, 4.2, 4.3 & 4.4

U7 Equipment			
Emission Point	**Description**	**Applicable Regulation**	**Control ID**
E16	45 gallon parts washer with secondary reservoir installed in 1995	6.18	N/A

U7 Control Devices: There are no control devices associated with Emission Unit U7.

U7 Specific Conditions

S1. **Standards (Regulation 2.16, section 4.1.1)**

VOC

a. The owner or operator shall install, maintain, and operate the control equipment as follows: (Regulation 6.18, section 4)

i. The cold cleaner shall be equipped with a tightly fitting cover that is free of cracks, holes, or other defects. If the solvent is agitated or heated, then the cover shall be designed so that it can be easily operated with 1 hand. (Regulation 6.18, section 4.1.1)

ii. The cold cleaner shall be equipped with a drainage facility that is designed so that the solvent that drains off parts removed from the cleaner will return to the cold cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system. (Regulation 6.18, section 4.1.2)

iii. A permanent, conspicuous label summarizing the operating requirements specified in Specific Condition S1.b. shall be installed on or near the cold cleaner. (Regulation 6.18, section 4.1.3)

iv. If used, the solvent spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing. Flushing of parts using a flexible hose or other flushing device shall be performed only within the freeboard area of the cold cleaner. Solvent flow shall be directed downward to avoid turbulence at the air-solvent interface and to prevent solvent from splashing outside of the cold cleaner. (Regulation 6.18, section 4.1.4)

v. Work area fans shall be located and positioned so that they do not blow across the opening of the cold cleaner. (Regulation 6.18, section 4.1.6)

vi. The solvent-containing portion of the cold cleaner shall be free of all liquid leaks. Auxiliary cold cleaner equipment such as pumps, water separators, steam traps, or distillation units shall not have any visible liquid leaks, visible tears, or cracks. (Regulation 6.18, section 4.1.8)

b. The owner or operator shall observe at all times the following operating requirements: (Regulation 6.18, section 4.2)

i. Waste solvent shall neither be disposed of nor transferred to another party in a manner such that more than 20% by weight of the waste solvent can evaporate. Waste solvent shall be stored only in a covered container. A covered container may contain a device that allows pressure relief, but

does not allow liquid solvent to drain from the container. (Regulation 6.18, section 4.2.1)

ii. The solvent level in the cold cleaner shall not exceed the fill line. (Regulation 6.18, section 4.2.2)

iii. The cold cleaner cover shall be closed whenever a part is not being handled in the cold cleaner. (Regulation 6.18, section 4.2.3)

iv. Parts to be cleaned shall be racked or placed into the cold cleaner in a manner that will minimize drag-out losses. (Regulation 6.18, section 4.2.4)

v. Cleaned parts shall be drained for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. (Regulation 6.18, section 4.2.5)

vi. A spill during solvent transfer shall be cleaned immediately, and the wipe rags or other sorbent material shall be immediately stored in a covered container for disposal or recycling, unless enclosed storage of these items is not allowed by fire protection authorities. (Regulation 6.18, section 4.2.6)

vii. Sponges, fabric, wood, leather, paper products, and other absorbent material shall not be cleaned in a cold cleaner. (Regulation 6.18, section 4.2.7)

c. The owner or operator shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F). (Regulation 6.18, section 4.3.2)

S2. **Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

VOC

a. The owner or operator shall maintain records that include the following for each purchase: (Regulation 6.18, section 4.4.2)

i. The name and address of the solvent supplier,

ii. The date of the purchase,

iii. The type of the solvent, and

iv. The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

b. All records required in U4 Specific Condition S2.a. shall be retained for 5 years and made available to the District upon request. (Regulation 6.18, section 4.4.3)

S3. **Reporting (Regulation 2.16, section 4.1.9.3)**

VOC

There are no routine compliance reporting requirements for Regulation 6.18.

Emission Unit U8: Barrel Toasting Operations

U8 Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
2.05	Prevention of Significant Deterioration of Air Quality	1 and 2
7.08	Standards of Performance for New Process Operations	1, 2, 3, & 5
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 5

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
5.01	General Provisions	1 through 4
5.02	Adoption of National Emission Standards for Hazardous Air Pollutants	3.1, 3.16
5.14	Hazardous Air Pollutants and Source Categories	1 through 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

U8 Equipment			
Emission Point	**Description**	**Regulations**	**Control ID**
E17	Preheat oven installed prior to 2001	7.08	N/A
		7.25	
E18	Infrared warmers	7.08	
		7.25	

U8 Control Devices: There are no control devices associated with Emission Unit U8.

U8 Specific Conditions

S1. **Standards (Regulation 2.16, section 4.1.1)**

a. **VOC**

The owner or operator shall not allow or cause the VOC emissions from this equipment to exceed 13 tons during any consecutive 12-month period. (Regulation 7.25, section 3) (BACT)

b. **PM**

The owner or operator shall not allow PM emissions to exceed 11.61 lb/hr for the preheat oven. (Regulation 7.08, section 3.1.2) (See Comment 1)

c. **Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

d. **NOx**

The owner or operator shall not allow NOx emissions to exceed 300 ppm by volume expresses as NO_2. (Regulation 7.08, section 4.1.) (See Comment 2)

e. **TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.01 and 5.21)

S2. **Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of five (5) years and make the records readily available to the District upon request.

a. **VOC**

The owner or operator shall monitor and maintain monthly records of the total VOC emissions for each calendar month and 12 consecutive month VOC emissions for each month.

b. **PM**

There are no compliance monitoring or record keeping requirements for this equipment. (See Comment 1)

c. **Opacity**

i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation and daylight hours, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.

ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.

iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

d. **NOx**

There are no compliance monitoring or record keeping requirements for this equipment. (See Comment 2)

e. **TAC**

i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.

ii. If a new TAC is introduced or the content of a TAC in a raw material increases, the owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions.

S3. **Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports.

a. **VOC**

i. Emission unit ID number and emission point and/or stack ID number;

ii. The beginning and ending date of the reporting period;

iii. Any exceedance of the VOC standard; and

iv. The total monthly and twelve consecutive month VOC emissions.

b. **PM**

There are no routine compliance reporting requirements for this equipment.

c. **Opacity**

i. Emission Unit ID number and Emission Point and/or stack ID number;

ii. The beginning and ending date of the reporting period;

iii. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;

iv. The date, time and results of each Method 9 conducted. If there were no Method 9 tests performed during the reporting period, the owner or operator may submit a negative declaration; and

v. Description of any corrective action taken.

d. **NOx**

There are no routine compliance reporting requirements for this equipment.

e. **TAC**

Within 6 months of a change of a raw material as described in i, the owner or operator shall submit the re-evaluated EA demonstration to the District.

U8 Comments

1. The potential uncontrolled PM emissions for each piece of equipment is less than the standard from Regulation 7.08.

2. The District performed a onetime compliance demonstration for NOx and the standard cannot be exceeded uncontrolled.

Emission Unit U9: Loss-in-Weight Feeder

U9 Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable sections**
7.08	Standard of Performance of New Process Operations	1, 2, 3 & 5

U8 Equipment			
Emission Point	**Description**	**Regulations**	**Control ID**
E24	Fully-enclosed 12" screw conveyor	7.08	NA
E25	Dust storage hopper		C-1
E26	K-Tron twin screw Loss-in-Weight feeder model K2-ML-T35		NA
E27	Weigh hopper discharge screw		NA
E28	Blower		NA

U9 Control Devices			
ID	**Description**	**Performance Indicator**	**Stack ID**
C-1	Donaldson Torit pulse-jet baghouse, model number 276RFW10	See U9 Specific Conditions	S-1

U9 Specific Conditions

S1. **Standards (Regulation 2.16, section 4.1.1)**

a. **PM**

The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr per piece of equipment. (Regulation 7.08, section 3.1.2) (Comment 1)

b. **Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

S2. **Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. **PM**

i. At least once per calendar month the owner or operator shall perform a visual inspection of the structural and mechanical integrity of the dust hopper and associated feed hardware for signs of damage, air leakage, corrosion, etc. and repair as needed.

ii. The owner or operator shall keep records of the visual inspection of the structural and mechanical integrity of the dust collector required.

b. **Opacity**

i. At least once per calendar month the owner or operator shall conduct a one-minute visible emissions survey, during normal operation and daylight hours, of each emission point. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.

ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 22, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District as required by Regulation 1.07, and take all practicable steps to eliminate the exceedance.

iii. The owner or operator shall maintain records of the results of all visible emissions surveys and tests. Records of the results of any visible

emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what, if any, corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

S3. **Reporting (Regulation 2.16, section 4.1.9.3)**

a. **PM**

i. Emission Unit ID number and Stack ID number;

ii. The beginning and ending date of the reporting period;

iii. The date, time, and results of each inspection of structural and mechanical integrity; and

iv. Description of any corrective action taken pursuant to S2.b.

b. **Opacity**

i. Emission Unit ID number and Stack ID number;

ii. The beginning and ending date of the reporting period;

iii. The date, time, and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration; and

iv. The date, time, and results of each Method 9 or Method 22 conducted. If no Method 9 or Method 22 tests were performed during the reporting period, the owner or operator may submit a negative declaration; Description of any corrective action taken pursuant to S2.b.

U9 Comments

1. The potential uncontrolled PM emission for each piece of equipment is less than the standard from Regulation 7.08.

2. Emission Unit 9 incorporates construction permit 202-09-C.

Permit Shield

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all the conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance, pursuant to Regulation 2.16, section 4.6.1.

Off-Permit Documents

There are no off permit documents associated with this Title V permit.

Alternative Operating Scenario

The company requested no alternative operating scenario in its Title V Application.

Insignificant Activities		
Description	**Quantity**	**Basis**
Miscellaneous wood working operations including: assembly crozier, bunghole drill, head stave dowel pin drill, head stave dowel pin drill, head stave tongue & groove ops, barrel router, equalizers, planers, jointers, edgers and head rounders	10	Regulation 2.02, section 2.3.5
Brazing, soldering or other welding equipment	4	Regulation 2.02, section 2.3.4
Indoor PM collectors venting indoors	1	Regulation 2.02, section 2.
Wood Drying Operation: 3 kilns installed in 1979 and 5 kilns installed in 1981 (U1)	8	Regulation 2.16, section 1.22.1

1) Insignificant Activities are only those activities or processes falling into the general categories defined in District Regulation 2.02, section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.

2) Activities identified in District Regulation 2.02, section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source.

Compliance Assurance Monitoring (CAM) Plan

Emission Unit: U2

Emission Point: E2, E4 and E5

Applicable Regulation: 7.08

PM Emission Limit: 2.51 lb/hr, 4.34 lb/hr and 2.34 lb/hr

Control Device: C2, C4 and C5

Monitoring Approach: The key elements of the monitoring approach are presented in the below Table.

	Indicator 1	**Indicator 2**	**Inspection Maintenance**
Indicator [(64.6c(1)(i)]	Pressure Drop (ΔP) across baghouse	Visible Emissions	Daily pressure drop monitor across the baghouses. Monthly visual inspection of the structural and mechanical integrity of the dust collector. Weekly and Quarterly maintenance inspection as Recommended by the manufacturer.
Measurement Approach [(64.6c(1)(ii)]	A pressure drop indicator shall be used to measure ΔP across the baghouse.	Visible emission surveys will be conducted on a monthly basis	
Indicator Range [(64.6(c)(2)]	An excursion for the baghouse is defined as any operating condition where the Δ P is less than 1 inches H_2O or greater than 6 inches H_2O.	An excursion for visible emissions is defined as the presence of any visible emissions greater than 20% opacity.	
Bypass [(64.6(a)(2)]	If the ΔP falls below the 1 inches H_2O, a possibility of a bypass is investigated.		
QIP Threshold [64.8]	Daily ΔP readings outside the performance indicator range for more than 3 times within a 1 month period	Visible emissions greater than 20% opacity for more than 3 times within a 1 month period	
Performance Criteria/data representativeness [64.6 (c)(1)(iii)	ΔP: Minimum acceptable accuracy of pressure drop indicator per manufacturers specifications	Measurements are made at the exhaust stack	
QA/QC Practices and Criteria [64.6 (b)(3)]	ΔP: Visual inspection per permit conditions and routine maintenance per manufacturer's recommendations. Inspect and maintain per Manufacturer's recommendations.	The observer will be certified in Method 9 procedures.	

	Indicator 1	Indicator 2	Inspection Maintenance
Monitoring Frequency [64.6 (b)(4)] Data Collection Procedures [64.6 (b)(4)(iii)]	ΔP monitored on a daily basis Recorded on a daily basis	Visible Emissions Survey conducted on a monthly basis Recorded by observer on a monthly basis	Monthly Inspection Records are maintained to document monthly visual inspection and any maintenance performed.
Record Keeping and Reporting [64.9]	Excursion reporting and corrective actions taken Semi-annual Reports include: Investigation and corrective action report. Date, time, and duration of excursion. Cause of and corrective actions taken to eliminate excursion, and Measures taken to prevent re-occurrence A description of the actions taken to implement a QIP (as applicable)	Semi-annual Reports include: Investigation and corrective action report. Date, time, and duration of excursion. Cause of and corrective actions taken to eliminate excursion, and Measures taken to prevent re-occurrence A description of the actions taken to implement a QIP (as applicable)	

Justification

Background: The pollutant specific emission source control devices at the facility consist of a baghouse to control PM emissions from the conveyance of wood from the process cyclones.

Rationale for Selection of Performance Indicators: Pressure drop and visible emissions were selected as performance indicators because, in combination, they are indicative of good operation and maintenance. When the system is operating properly, there will be little or no visible emissions. This is a good indicator because any increase in visible emissions indicates reduced control device performance.

Rationale for Selection of Indicator Ranges: The selected range for the baghouse is 1" to 6" H_2O. These values are based on manufacturer's recommended specifications for proper operation of the control devices. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence. All excursions will be documented.

Quality Improvement Plan (QIP) Threshold: The selected QIP threshold is three excursions within a 1 month period. If the QIP threshold is exceeded in a semi-annual period, a QIP will be developed and implemented.

Emission Unit: U5

Emission Point: E12

Applicable Regulation: 6.07

PM Emission Limit: 0.40 lbs per MMBtu heat input

Control Device: C11

Monitoring Approach: The key elements of the monitoring approach are presented in the below Table.

	Indicator 1	**Indicator 2**	**Inspection Maintenance**
Indicator [(64.6c(1)(i)]	Pressure Drop (ΔP) across the wet scrubber	Visible Emissions	Daily pressure drop monitor across the wet scrubber. Daily visual inspections.
Measurement Approach [(64.6c(1)(ii)]	A pressure drop indicator shall be used to measure ΔP across the wet scrubber.	Method 9Visible emission surveys will be conducted on a Daily basis.	
Indicator Range [(64.6(c)(2)]	An excursion for the scrubber is defined as any operating condition where the Δ P is less than 2 inches H_2O or greater than 6 inches H_2O.	An excursion for visible emissions is defined as the presence of any visible emissions greater than 20% opacity on a six minute average.	
Bypass [(64.6(a)(2)]	If the ΔP falls below the 2 inches H_2O, a possibility of a bypass is investigated.	If the Opacity exceeds 20%, a possibility of a bypass in investigated	
QIP Threshold [64.8]	Daily ΔP readings outside the performance indicator range for more than 3 times within a 1 month period	Visible emissions greater than 20% opacity for more than 3 times within a 1 month period	If visible emissions are observed greater than 20%, corrective action is taken within eight (8) hours of the initial observation.
Performance Criteria/data representativeness [64.6 (c)(1)(iii)	ΔP: Minimum acceptable accuracy of pressure drop indicator per manufacturers specifications	Measurements are made at the exhaust stack	
QA/QC Practices and Criteria [64.6 (b)(3)]	ΔP: Visual inspection per permit conditions and routine maintenance per facilities PM schedule. ΔP monitored on a daily	The observer will be certified in Method 9 procedures.	

	Indicator 1	Indicator 2	Inspection Maintenance
Monitoring Frequency [64.6 (b)(4)] Data Collection Procedures [64.6 (b)(4)(iii)]	basis Recorded on a daily basis	Visible Emissions Survey conducted on a daily basis Recorded by observer on a daily basis	Annual Inspection Records are maintained to document daily visual inspections and any maintenance performed.
Record Keeping and Reporting [64.9]	Excursion reporting and corrective actions taken Semi-annual Reports include: Investigation and corrective action report. Date, time, and duration of excursion. Cause of and corrective actions taken to eliminate excursion, and Measures taken to prevent re-occurrence A description of the actions taken to implement a QIP (as applicable)	Semi-annual Reports include: Investigation and corrective action report. Date, time, and duration of excursion. Cause of and corrective actions taken to eliminate excursion, and Measures taken to prevent re-occurrence A description of the actions taken to implement a QIP (as applicable)	

Justification

Background: The pollutant specific emission source control devices at the facility consist of a Wet scrubber to control PM emissions from the combustion of wood waste.

Rationale for Selection of Performance Indicators: Pressure drop and visible emissions were selected as performance indicators because, in combination, they are indicative of good operation and maintenance. When the system is operating properly, there will be little or no visible emissions. This is a good indicator because any increase in visible emissions indicates reduced control device performance.

Rationale for Selection of Indicator Ranges: The selected range for the wet scrubber is 2" to 6" H_2O. These values are based on manufacturer's recommended specifications for proper operation of the control devices. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence. All excursions will be documented.

Quality Improvement Plan (QIP) Threshold: The selected QIP threshold is three excursions within a 1 month period. If the QIP threshold is exceeded in a semi-annual period, a QIP will be developed and implemented.